



***Cabinet for Health and Family Services (CHFS)  
Information Technology (IT) Policy***



***050.101 Privacy and Security Awareness Program***

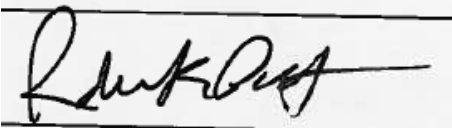

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050.101 Privacy and Security Awareness Program	Current Version: 2.1
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## Revision History

Date	Version	Description	Author
11/30/2006	1.0	Effective Date	CHFS OATS Policy Charter Team
4/27/2017	2.1	Revision Date	CHFS OATS Policy Charter Team
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## Sign-Off

Sign-off Level	Date	Name	Signature
CHFS Chief Information Officer (or designee)	4/27/2017	ROBERT PUTT	
CHFS Chief Security Officer (or designee)	4/27/2017	DENNIS E. LEWIS	

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# 1 050.101 Privacy and Security Awareness Program

Category: 050.000 Security Awareness

## 1.1 Purpose

The Cabinet for Health and Family Services (CHFS) Office of Administrative and Technology Services (OATS) must establish an acceptable level of security controls to be implemented through a privacy and security program. This document establishes the agency's Privacy and security Awareness Program Policy which helps manage risks and provides guidelines for security best practices regarding privacy and security.

## 1.2 Scope

The scope of this policy applies to all internal CHFS employees, consultants, temporary personnel, third party providers under contract with a CHFS agency, and other entities that interact with CHFS information related resources. This policy covers the applicable computer, application, and data communication systems. External vendors providing information security or technology services may work with the CHFS agency(s) for exceptions to this policy.

This policy applies to all CHFS employees and any contractor or other user with a CHFS domain Active Directory (AD) account (hereinafter "contractor"), including all persons providing contractor services, who use, process, or store computerized data relevant to agency business. Any employee, contractor or contracted 3rd party entity with access to CHFS data must participate in or provide a security awareness program. Third parties with access to CHFS data but without a CHFS AD account must manage their own awareness program.

## 1.3 Roles and Responsibilities

### 1.3.1 OATS Information Security Team

Responsible for the assessment, planning, and implementation of all security standards, practices, and commitments required. This role is responsible for the adherence of the Privacy and Security Awareness Program Policy.

### 1.3.2 Privacy Lead

The individual(s) responsible for providing privacy and security guidance for protection of Personally Identifiable Information (PII), Electronic Personal Health Information (ePHI), Federal Tax Information (FTI) and other sensitive information to all CHFS staff and contractor personnel. This role is responsible for the adherence of the CHFS Privacy and Security Awareness Training Policy in concert with the OATS Information Security (IS) Team.

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### **1.3.3 CHFS Staff and Contract Employees**

Individual(s) must adhere to the Privacy and security Awareness Training Policy as well as referenced documents that pertain to the agency's applications, application servers, appliances, operating systems, web servers, network components, and database (server or components) that reside on CHFS/OATS information system.

## **1.4 Management Commitment**

This policy has been approved by OATS Division Directors, CHFS Chief Technical Officials, and CHFS Chief Information Officer (CIO). Senior Management supports the objective put into place by this policy.

## **1.5 Coordination among Organizational Entities**

OATS coordinates with other organizations or agencies within the cabinet with access to applications or systems. All organizational entities that interact with CHFS systems, within or contracted with OATS, are subject to follow requirements outlined within this policy.

## **1.6 Compliance**

As the official guidance domain for this policy, CHFS agencies abide by the security and privacy requirements established in though state laws and regulations as well as federal guidelines outline in the National Institute of Standards and Technology (NIST). Applicable agencies additionally follow security and privacy framework outlined within the Centers for Medicare and Medicaid Services (CMS), the Internal Revenue Services (IRS), and the Social Security Administration (SSA).

# **2 Policy Requirements**

## **2.1 General**

This policy defines and details the requirement for privacy and security awareness that data owners are expected to implement to safeguard their computing assets. All new employees and contractors are presented with access to enterprise and cabinet privacy and security policies, standards, procedures, and the CHFS Employee Privacy and Security of Protected Health, Confidentiality, and Sensitive Information Agreement (CHFS 219 Form), prior to the provision of access to any CHFS computing asset. All CHFS employees and contract staff are also to be reminded annually on their privacy and security responsibilities. Additionally, the OATS Information Security (IS) Team is responsible for sending out periodic reminders concerning contemporaneous privacy and security events as well as current privacy and security risks.

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To satisfy the requirement for the Privacy and Security Awareness Program, basic privacy and security awareness training to all state and contract staff must be provided:

- Prior to system access;
- When major system change occurs;
- Within every three hundred and sixty-five (365) days thereafter;

CHFS agencies, or dedicated department or system, will maintain a written record to document privacy and security awareness activities were completed. Documentation showing completion of training for staff will be kept for at least ten (10) years.

### 3 Policy Maintenance Responsibility

The OATS IS Team is responsible for the maintenance of this policy.

### 4 Exceptions

Any exceptions to this policy must follow the procedures established in CHFS OATS Policy: 070.203.

### 5 Policy Review Cycle

This policy is annually reviewed and revised on an as needed basis.

### 6 References

- Centers for Medicare and Medicaid Services (CMS) MARS-E 2.0
- CHFS Confidentiality/Security Agreement/Internet and Electronic Policies and Procedures- CHFS-219 Form
- CHFS OATS Policy: 070.203- Security Exceptions and Exemptions to CHFS OATS Policies and Security Controls Policy
- CHFS Office of Human Resources Management (OHRM) Personnel Procedures Handbook, Chapter II: 2.10
- Enterprise IT Procedure: COT-067- Enterprise Security Standard Process and Procedure Manual (ESPPM) Process
- Internal Revenue Services (IRS) Publications 1075
- National institute of Standards and Technology (NIST) Special Publication 800-53 Revision 4, Privacy and security Controls for Federal Information Systems and Organizations
- Social Security Administration (SSA) Security Information